

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

CINDY CODONI, MICHELLE GEER,  
HORACE CATHCART, AMY FRANCE, and  
TAMARA CHAKOS, individually and on behalf  
of all others similarly situated,

**Plaintiffs,**

V.

PORT OF SEATTLE, ALASKA AIR GROUP,  
and DELTA AIR LINES, INC.,

### Defendants.

Case No. 2:23-CV-00795 JNW

**STIPULATED MOTION REGARDING  
BRIEFING DEADLINES FOR  
PLAINTIFFS' OPPOSITION TO AND  
DEFENDANTS' REPLIES IN SUPPORT  
OF DEFENDANTS' MOTIONS TO  
DISMISS PLAINTIFFS' SECOND  
AMENDED COMPLAINT**

**NOTE ON MOTION CALENDAR:  
November 13, 2023**

Pursuant to Western District of Washington Local Rules 7(d)(1) and 10(g), Plaintiffs Cindy Codoni, Michelle Geer, Horace Cathcart, Amy France, and Tamara Chakos (“Plaintiffs”) and Defendants Alaska Air Group, Delta Airlines, Inc. (“Airlines”), and Port of Seattle (collectively, “Defendants”) stipulate and move as follows:

WHEREAS, on June 27, 2023, this Court ordered Plaintiffs to file a Second Amended Complaint on or before August 11, 2023, and ordered the parties to confer in good faith to set a deadline for Defendants to respond to the Second Amended Complaint (ECF No. 41);

WHEREAS, on August 11, 2023, Plaintiffs filed their Second Amended Class Action Complaint (ECF No. 43);

WHEREAS, on September 18, 2023, this Court ordered Defendants to file their Rule 12 motions in response to the Second Amended Complaint on or before October 27, 2023, and ordered the parties to confer in good faith to set a deadline for Plaintiffs’ opposition to Defendants’ motions and Defendants’ replies in support thereof (ECF No. 45); and

WHEREAS, the parties have conferred in good faith regarding an appropriate briefing schedule and agree that Plaintiffs’ deadline to file their opposition to Defendants’ motions to dismiss is December 22, 2023, and Defendants’ deadline to file their replies in support of their motions is February 16, 2024;

**THEREFORE, IT IS STIPULATED AND AGREED** among the Parties, subject to the Court’s approval, that:

1. Plaintiffs shall file their opposition(s) to Defendants’ motions to dismiss Plaintiffs’ Second Amended Complaint on or before December 22, 2023.

2. Defendants shall file their replies in support of their motions to dismiss Plaintiffs’ Second Amended Complaint on or before February 16, 2024.

3. Nothing in this stipulated order shall alter any other deadlines in the case, including those deadlines included in this Court’s September 18, 2023, order (ECF No. 45).

**IT IS SO STIPULATED.**

DATED: November 13, 2023

## HAGENS BERMAN SOBOL SHAPIRO LLP

By: s/Steve W. Berman

Steve W. Berman, WSBA No. 12536

*Attorney for Plaintiffs*

DATED: November 13, 2023

MCNAUL EBEL NAWROT & HELGREN  
PLLC

By: s/ *Malaika M. Eaton*

Malaika M. Eaton, WSBA No. 32837

*Attorney for Defendant Delta Air Lines, Inc.*

DATED: November 13, 2023

CORR CRONIN LLP

By: s/ Steven W. Fogg

Steven W. Fogg, WSBA No. 23528

*Attorney for Defendant Alaska Air Group*

DATED: November 13, 2023

STOEL RIVES LLP

By: s/ Beth Ginsberg

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Beth Ginsberg, WSBA No. 18523

*Attorney for Defendant Port of Seattle*

## IT IS SO ORDERED:

Dated this 14th day of November, 2023.



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Jamal N. Whitehead  
United States District Judge

1 Presented by:

2 DATED: November 13, 2023

HAGENS BERMAN SOBOL SHAPIRO LLP

4 By: s/Steve W. Berman

5 Steve W. Berman, WSBA No. 12536

6 *Attorney for Plaintiffs*

7 DATED: November 13, 2023

8 MCNAUL EBEL NAWROT & HELGREN  
9 PLLC

10 By: s/Malaika M. Eaton

11 Malaika M. Eaton, WSBA No. 32837

12 *Attorney for Defendant Delta Air Lines, Inc.*

13 DATED: November 13, 2023

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17 *Attorney for Defendant Alaska Air Group*

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19 STOEL RIVES LLP

20 By: s/Beth Ginsberg

21 Beth Ginsberg, WSBA No. 18523

22 *Attorney for Defendant Port of Seattle*